

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2013 – 275-WS

IN RE: Application of Carolina Water)
Service, Inc., for adjustment of)
rates and charges and modification)
of certain terms and conditions for the)
provision of water and sewer service)

PETITION TO INTERVENE

Forty Love Point, a neighborhood near Chapin, South Carolina would respectfully show this Commission as follows:

BACKGROUND

1. The Petitioner, Forty Love Point Homeowners' Association, represents a community of approximately 130 households near Chapin, South Carolina. (We share a water system with the Indian Fork neighborhood that has approximately 70 households.)
2. The Petitioner is a homeowners' association as defined by South Carolina Code section 12-43-230 and other sections in the South Carolina Code.
3. All communications or inquiries regarding this Petitioner should be directed to the following:
 - a. Richard Ouzts
President, Forty Love Point Homeowners' Association
125 Forty Love Point Drive
Chapin, SC 29036
 - b. Laura P. Valtorta
Attorney for the Petitioner (and resident of Forty Love Point)
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OPPOSITION TO RATE INCREASES AND ALL OTHER FEES AND MODIFICATIONS REQUESTED BY CAROLINA WATER SERVICE

4. **POOR WATER QUALITY.** Forty Love Point purchases residential water service and residential wastewater services from Carolina Water Services (also known as “Utilities, Inc.”) and has done so since the neighborhood’s inception about 25 years ago. At the time the first phase of Forty Love Point was constructed, there was no alternative water service available in the area.

Since the neighborhood was built, Forty Love Point has had complaints about Carolina Water Service: the quality of the water (undrinkable); the hardness of the water, the occurrence of iron bacteria in the water, the chlorine smell, the frequent “boil water” advisories because of breaks in the system, and the poor customer service. Most households purchase bottled drinking water or filter the water before drinking. We have no fire hydrants in the neighborhood.

We experienced an e-coli outbreak in January 2012. This caused one of our 7 wells to be shut down. Currently, the water receive is over-chlorinated.

These problems continue despite complaints to South Carolina Department of Health and Environmental Control, to Carolina Water Service itself, and before this Commission (2006-92-WS; and 2011-47-WS).

Upon information and belief, Forty Love Point pays more for its water and wastewater service than neighborhoods approximately half a mile away who have Columbia Water Service.

We oppose the enormous increase in water rates that Carolina Water Service is requesting. Carolina Water Service is violating S.C. Code 58-5-710 et ff. by failing to provide adequate service.

5. **CONNECTION SERVICES.**

Forty Love Point has often expressed a desire to switch to another water/wastewater service. Carolina Water Service has succeeded in making this overly expensive for the neighborhood. We strongly oppose any charges for connecting or disconnecting to water/wastewater services as the neighborhood’s goal is to acquire water service from the City of Columbia at a reasonable cost. Adding connection and disconnection charges would only increase this burden.

6. **NO LIABILITY FOR IMPROVEMENTS IN OTHER NEIGHBORHOODS.**

Forty Love Point opposes any payment or increase in payment that would require us to pay for services or improvements in other neighborhoods. Each household should pay for its own individual water/wastewater service, and no more.

7. OFFICE OF REGULATORY STAFF CANNOT FULLY REPRESENT OUR INTERESTS.

While the Office of Regulatory Staff is a commendable organization, they cannot fully represent before this Commission the problems our neighborhood is facing.

The proposed rate increase affects a number of neighborhoods receiving a variety of different services from Carolina Water Service. Each neighborhood has a separate set of problems.

Forty Love Point requests the ability to conduct discovery, present witnesses, present evidence, receive all pleadings and notices including notices of settlement negotiations, and participate fully as a party in this action.

8, **DATE OF SERVICE OF NOTICE.** We received notice that CWS had filed its request for a rate increase in the mail on October 1, 2013.

Respectfully submitted by,

/s/ Laura P. Valtorta
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October 3, 2013